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VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

**Re: Joint Application of Duke Energy Carolinas, LLC and Duke Energy
Progress, LLC to Establish Green Source Advantage Programs and
Riders GSA
Docket Number 2018-320-E**

Dear Ms. Boyd:

On January 7, 2019, the South Carolina Solar Business Alliance, Inc. ("SCSBA") filed comments with the Commission in the above-referenced docket ("SCSBA Comments") pursuant to Commission Order No. 2018-178-H. Accompanying the SCSBA Comments was a procedural request to the Commission to allow for an additional round of comments after the North Carolina Utilities Commission ("NCUC") issues an Order on the North Carolina Green Source Advantage Programs ("NC GSA Programs"). Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP," and together with DEC, the "Companies") have filed today Reply Comments in the above-referenced docket, which address the comments of all intervenors in this docket, but are responding in this letter to the SCSBA request for additional opportunity to file comments.

Specifically, SCSBA requests an additional 60 days to file further comments in this proceeding to provide parties time to review the NCUC order on the NC GSA Programs and provide comments in this proceeding based on the NCUC order. As an initial matter, it is important to acknowledge that the January 7, 2019, comment deadline in this proceeding was actually set at SCSBA's request. SCSBA's requested extension in this proceeding is unnecessary and would significantly delay this proceeding without just cause. Although the Companies are proposing similar green source advantage programs in both states, the programs are completely independent of one another, and the outcome of the NCUC proceeding does not impact the South Carolina GSA Programs proposed to this Commission. SCSBA contends that the "level of scrutiny received" by the NC GSA Programs justifies its requested extension of time. However, the "level of scrutiny received" in the NCUC proceeding does not concern this program, as the SC GSA

The Honorable Jocelyn G. Boyd
January 28, 2019
Page 2

Programs are independent of the NC GSA Programs. Thus, the NCUC proceeding has no bearing on the instant proceeding, and the parties to that proceeding and issues raised in that proceeding are unique to the NC GSA Program and the jurisdiction of the NCUC.

Moreover, the NC GSA Programs are being implemented pursuant to recently-enacted North Carolina session law 2017-192 (often referred to as "House Bill 589"), which includes a suite of renewable energy programs that the NCUC is currently in the process of implementing. As such, the NCUC proceeding contains unique statutory considerations which are not present in this proceeding. Further, given that DEC and DEP each serves customers in both states, it is not uncommon for similar proceedings to be ongoing at the NCUC and this Commission at the same time. The Companies are not aware of any other instance in which the Commission has delayed its own proceeding in order to provide parties time to provide additional "final comments" subsequent to an order being issued by another commission. This Commission is, of course, free to wait to issue its decision in this proceeding until after the NCUC order is issued and to be informed by the outcome of that proceeding. But, to extend the comment period in this proceeding in order to allow the Intervenors to provide an additional round of comments on the NCUC order would be unprecedented and would unnecessarily delay this proceeding without good cause.

Accordingly, the Companies request that the Commission deny SCSBA's request for an additional comment period. Should you have any questions regarding this matter, please do not hesitate to contact me at 803.988.7130.

Sincerely,



Rebecca J. Dulin

cc: Parties of Record (via email)